

Information Bulletin

Management Assessment of Transportation Safety Document (TSD) Implementation Raises Awareness at Facility; Results in Self-Identification of Non-Compliance

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Summary: Facility personnel demonstrated an improved awareness and understanding of TSD requirements as a result of a Management Assessment performed to determine how documented safety analysis (DSA) requirements related to transportation were implemented at operating facilities. Once facility personnel recognized that transportation safety requirements for certain shipments were equivalent to those of the facility DSA, their increased attention to detail resulted in self-identification of a non-compliant condition.

Discussion of Activities: Transportation and Packaging declared a Potential Inadequacy in the Safety Analysis (PISA) related to shipments of retrieved waste drums which contain prohibited amounts of unabsorbed liquids and noncompliant aerosol cans. The issue had been self-identified by a shipper following a management assessment conducted by Transportation and Packaging. Three of the core issues identified by the management assessment, all related to processes for incorporating Safety Analysis Report for Packaging (SARP) requirements into facility procedures, were determined to have contributed to the non-compliant conditions discovered at the facility.

Analysis: The management assessment indicated that the integration of program requirements into the facilities had some weaknesses. Roles and responsibilities between the shippers and the facilities were not well defined or documented. Consequently, responsibility for confirming the shipping requirements were met was also not clearly defined. Although personnel were expected to be knowledgeable of the TSD requirements, there was no training assigned for facility personnel outside of the Transportation Safety Operations (TSO) organization. Requirements from procedures described in the SARP were not consistently tiered down to operating procedures at the facility. The formal mechanism to verify that facility procedures addressed SARP requirements was not always initiated because, due to a lack of training, personnel were unaware the TSD requirements were applicable.

The causal analysis determined that although the TSD is considered a documented safety analysis under 10CFR830, the programs which support implementation and maintenance of the TSD are independent of the program established for maintenance of nuclear facility safety basis documents. The scope of procedures for facility nuclear safety basis development and maintenance specifically excluded the transportation safety basis documents. TSO has been working over the last two years to establish equivalent programs. However, these programs are not as well integrated or mature as those currently in place for FH facility nuclear safety. No systematic analysis was performed to determine if additional resources were needed to

implement the Transportation Safety Basis as a nuclear safety basis. While the facilities regard TSO as the owner of the TSD processes, TSO is not currently empowered or staffed to address those aspects of the TSD implemented at the facility. Once all affected personnel understand the TSD is a safety basis document, and the implications of failure to meet the associated requirements, the potential for a noncompliance is reduced.

Recommended Actions: When possible, implementation processes for Transportation Safety Documents should be modeled after facility nuclear safety implementation processes. Transportation and Packaging will follow an implementation validation process, a compliance matrix process, and employ other tools, such as the model structure provided by ISMS core functions, that have been successfully used by facility Nuclear Safety organizations.

Cost Savings/Avoidance: Not Evaluated

Work Function: Authorization Basis

Hazards: Other

ISM Core Functions: Develop/Implement Controls

Keywords: Transportation Safety, Authorization Basis

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References: EM-RL-PHMC-GENSERVICE-2006-0003